

Message

From: McGrath, Jesse [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C34718C70BB64FE58E72FA1AB387E90E-JMCGRA02]
Sent: 3/8/2017 5:37:29 PM
To: Mikel, Dennisk [Mikel.Dennisk@epa.gov]
Subject: RE: Agenda items for next weeks QA Call

The MQO is not that each point must be inside of 7%, the CFR is very clear that the MQOs are the bias and standard deviation.

I don't know where people are getting that from. The CFR is also clear that not meeting the MQO is not a cause for invalidation and that you *must* investigate the issue to determine if the data are invalid. The guidance says the same thing. That's what must be followed.

No one should be writing QAPPs that contradict that - their QAPPs, and QMPs must conform to scientifically defensible techniques and the CFR. We cannot force agencies to write QAPPs that contradict that, nor require them to commit to QAPPs that do.

What I'm getting at is that people, including Mike, are saying that what's in that quote below conforms to the CFR and guidance, is what has always been done, and that there's some wide consensus. I know none of those things are true, and the reason no one has done it that way is because it's completely indefensible – EPA's reputation as an accurate source of data will be ruined if we proceed on this route.

If you did things differently there's nothing wrong with saying that, and today I think it will be a necessary part of the discussion. I encourage you to join the call today so you can explain the history of the program because people need to it understand what we're doing today.

Thank you,
Jesse

From: Mikel, Dennisk
Sent: Wednesday, March 08, 2017 9:24 AM
To: McGrath, Jesse <mcgrath.jesse@epa.gov>
Subject: RE: Agenda items for next weeks QA Call

Jesse, I reviewed the guidance memo written by Mike Papp about the data. Since this is a MQO criteria, it must be followed. However, monitoring agencies and PQAOs must follow their QAPPs and QMPs. Mike gives the Regions and the monitoring organization a way out of this situation. Here is what the guidance says:

- **Determine what monitoring organizations have acceptance criteria in their approved QAPP that is greater than the 7% precision and \pm 7% bias requirement for ozone. Since the agencies were following the requirements in their approved QAPP, it would not be appropriate to invalidate data that met their acceptance criteria.** However, we need to determine the extent that the QAPPs acceptance criteria diverge from the Validation Template criteria and the affect it has on design values.
 - In order to maintain some level of documentation for future IG corrective action, please send QAPPs with acceptance criteria greater than the 7% precision and \pm 7% bias requirement for ozone to OAQPS for verification/archive.

I think this is a reasonable compromise. If an agency's QAPP says it will not invalidate the data if a PC is outside of +/- 7%, OAQPS will not invalidate the data. However, the IG may require OAQPS to invalidate data in AQS sometime in the future.

I would let your monitoring agencies know that when their QAPPs get reviewed and it is time for revisions, that this must be written into the QAPP since it is a critical MQO.

Good luck on the call,

Dennis Mikel
Physical Scientist
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From: McGrath, Jesse
Sent: Tuesday, March 07, 2017 5:42 PM
To: Mikel, Dennisk <Mikel.Dennisk@epa.gov>
Subject: FW: Agenda items for next weeks QA Call

Thank you,
Jesse

From: Hamilton, Scott
Sent: Thursday, March 02, 2017 7:20 AM
To: McGrath, Jesse <mcgrath.jesse@epa.gov>
Subject: FW: Agenda items for next weeks QA Call

Scott Hamilton
Air Monitoring and Analysis Section
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U.S. Environmental Protection Agency
Phone: 312-353-4775

From: Papp, Michael
Sent: Wednesday, March 01, 2017 11:33 AM
To: Ackerman, Laura <Ackerman.Laura@epa.gov>; Carlson, Albion <Carlson.Albion@epa.gov>; Hass, Andrew <hass.andrew@epa.gov>; Ross, Anthony <ross.anthony@epa.gov>; Teitz, Avraham <Teitz.Avraham@epa.gov>; Bedel, Anthony <bedel.anthony@epa.gov>; Qazzaz, Bilal <qazzaz.bilal@epa.gov>; Brown, Ethan <Brown.Ethan@epa.gov>; Hall, Chris <Hall.Christopher@epa.gov>; Compher, Michael <compher.michael@epa.gov>; Coughlin, Justin <coughlin.justin@epa.gov>; France, Danny <France.Danny@epa.gov>; Davis, Michael <Davis.Michael@epa.gov>; Crumpler, Dennis <Crumpler.Dennis@epa.gov>; Jager, Doug <Jager.Doug@epa.gov>; Clover, Fletcher <Clover.Fletcher@epa.gov>; Gaige, Elizabeth <Gaige.Elizabeth@epa.gov>; Garver, Daniel <Garver.Daniel@epa.gov>; Noah, Greg <Noah.Greg@epa.gov>; YOSHIMURA, GWEN <Yoshimura.Gwen@epa.gov>; Harris, Keith <Harris.Keith@epa.gov>; Hoyer, Marion <hoyer.marion@epa.gov>; Jackson, Clarence <Jackson.Clarence@epa.gov>; Regehr, James <Regehr.James@epa.gov>; Williams, Jennifer <Williams.Jennifer@epa.gov>; Rickard, Joshua <Rickard.Joshua@epa.gov>; Judge, Robert <Judge.Robert@epa.gov>; Allen, Kara <Allen.Kara@epa.gov>; Hence, Kia <hence.kia@epa.gov>; Biland, Larry <Biland.Larry@epa.gov>; Grooms, Leland <Grooms.Leland@epa.gov>; Limaye, Vijay <Limaye.Vijay@epa.gov>; Sena, Lorenzo <Sena.Lorenzo@epa.gov>; Hyden, Loretta <Hyden.Loretta@epa.gov>; Lehrman, Loretta <lehrman.loretta@epa.gov>; Shanis, Mark <Shanis.Mark@epa.gov>; Cuzzupe, Mary Jane

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Subject: Agenda items for next weeks QA Call

Please provide me with agenda items for the next call.

One big item that will be discussed is the issue brought up on the last Regional Office Call about the OIG alert and what to do about monitoring organizations not meeting the 1-point QC checks. After the Regional call, OAQPS and Region 4 met to discuss the South Carolina data and our suggestion was that R4 request SC invalidation of any data not meeting the 1-point QC acceptance criteria (7% precision and \pm 7% bias) as described in the SC QAPP.

In order for some level of consistency across the nation we drafted the attached memo. At present this is a draft but it reflects OAQPS position on the acceptance criteria. Ben Wells has done some evaluations and is also attached.

Also I'd like to discuss the June Meeting. Response n the dates are as follows. Based on this my suggestion in week of June 26th. I realize that with uncertainty in budgets and travel this may not come to fruition.

Regions	Date
1	either
2	June 26
3	either
4	June 26
5	either
6	either
7	either
8	
9	either
10	June 19;

Mike Papp
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